

EXHIBIT 42

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Attorneys for Defendant
PRECISION VALVE & AUTOMATION, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ, an individual and ISELA
HERNANDEZ, an individual,

Plaintiffs,

vs.

PRECISION VALVE & AUTOMATION, Inc., a
corporation and DOES 1-20,

Defendants.

Case No.: CV17-03342-ODW(GJSX)

**DEFENDANT PRECISION VALVE &
AUTOMATION, INC.'S
INTERROGATORIES TO PLAINTIFF
ISELA HERNANDEZ, SET NO. ONE**

PROPOUNDING PARTIES: Defendant PRECISION VALVE &
AUTOMATION, INC.

RESPONDING PARTY: Plaintiff ISELA HERNANDEZ

SET NO: ONE

Defendant PRECISION VALVE & AUTOMATION, INC. requests that the responding
party, plaintiff ISELA HERNANDEZ, answer the following Interrogatories, under oath, within
thirty (30) days, pursuant to Federal Rule of Civil Procedure 33.

DEFINITIONS APPLICABLE TO ALL INTERROGATORIES

1. The term "COMPLAINT" refers to the Complaint filed on behalf of plaintiffs
Ruben Juarez and Isela Hernandez in the Superior Court of California, County of Los Angeles, on
February 28, 2017.

2. "DEFENDANT" means PRECISION VALVE & AUTOMATION, INC.

3. "EVIDENCE" means any facts, witnesses (including contact information), statements, video, pictures, photos, recordings, documents, writings, depositions, transcripts, interviews, data, compilations, reports, productions and any other evidence of any kind whatsoever.

4. "INJURIES" means any injuries and/or damages including but not limited to the loss of love, care companionship, comfort, assistance, protection, society and moral support from Ruben Juarez.

5. The terms "YOU" and "YOUR" mean and refer to plaintiff ISELA HERNANDEZ and anyone acting on his behalf, including, but not limited to, attorneys, investigators, insurers, and any other agents.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify in detail all EVIDENCE which supports or in any way relates to YOUR allegations against DEFENDANT in this case.

INTERROGATORY NO. 2:

Identify in detail all EVIDENCE which supports or in any way relates to YOUR cause of action for Loss of Consortium (Third Cause of Action) in the COMPLAINT.

INTERROGATORY NO. 3:

Identify in detail all EVIDENCE which supports or in any way relates to YOUR claim that Defendant's wrongful conduct, acts and/or omissions "were a substantial factor in causing Plaintiff ISELA HERNANDEZ to sustain loss of love, care companionship, comfort, assistance, protection, society, moral support from Plaintiff RUBEN JUAREZ" as alleged in the COMPLAINT.

INTERROGATORY NO. 4:

DESCRIBE in detail all INJURIES which YOU allege were caused, or were in any way contributed to, by Defendant's wrongful conduct, acts and/or omissions, as alleged in YOUR COMPLAINT.

(As used in this interrogatory, "DESCRIBE" means to describe in as much detail as

possible including but limited to listing what the injury was, what body part(s) were affected, if any, the date(s) the injury took place, how it progressed, its current status, and the date it ended, if any.)

INTERROGATORY NO. 5:

DESCRIBE in detail everything YOU did to determine what caused Isela Hernandez's injuries which are alleged in the COMPLAINT.

(As used in this interrogatory, the term "DESCRIBE" means to list everything YOU did including but not limited to any investigation, research, internet research, questions, and communications, and exactly when, by date, it was done.)

INTERROGATORY NO. 6:

Identify in detail all EVIDENCE which establishes or in any way relates to whether plaintiffs' lawsuit is barred by the two-year statute of limitations found in Code of Civil Procedure section 335.1.

Dated: July 17, 2017

BECHERER KANNETT & SCHWEITZER

By: 

Alex P. Catalona
Attorney for Defendant
PRECISION VALVE & AUTOMATION, INC.

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PRECISION VALVE & AUTOMATION, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA HERNANDEZ, an individual,)	CASE NO. 2:17-cv-03342 ODW (GJSx)
)	
Plaintiffs,)	[Los Angeles County Superior Court Case No. BC650229]
)	
v.)	CERTIFICATE OF SERVICE
)	
PRECISION VALVE & AUTOMATION, INC., a corporation and DOES 1-20,)	
)	
Defendants.)	

I, Jerry M. Dumlaio, declare that I am employed in the County of Alameda, State of California; I am over the age of eighteen (18) years and not a party to the within entitled action; my business address is 1255 Powell Street, Emeryville, California 94608.

On July 17, 2017, I caused to be served the foregoing:

**DEFENDANT PRECISION VALVE & AUTOMATION, INC.'S
INTERROGATORIES TO PLAINTIFF ISELA HERNANDEZ, SET NO. ONE**

In said action by placing a true copy thereof enclosed in a sealed envelope and served in the manner and/or manners described below to each of the parties herein and addressed as follows:

Attorneys for Plaintiff

Teresa Li, Esq.
LAW OFFICES OF TERESA LI, PC
315 Montgomery Street, 9th Floor
San Francisco, California 94104
Telephone: (415) 423-3377
Facsimile: (888) 646-5493
Email: teresa@lawofficesofteresali.com

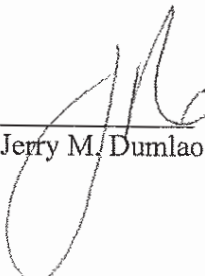
Becherer
Kannett &
Schweitzer

1255
Powell St.
Emeryville, CA
94608
510-658-3600

1 ☒ (By Mail) I deposited such envelope with postage thereon fully prepaid to be placed
2 in the United States Mail at Emeryville, California. I am familiar with the mail
3 collection practices of Becherer Kannett & Schweitzer Attorneys and pursuant to those
4 practices the envelope would be deposited with the United States Postal Service the
5 same day.

6 ☒ (Via Facsimile) I caused said document(s) to be transmitted to the facsimile
7 number(s) of the addressee(s) designated.

8 Executed on July 17, 2017.

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10 Jerry M. Dumlao
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24 Becherer
25 Kannett &
26 Schweitzer

27 1255
28 Powell St.
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